THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

ORION CORPORATION,	
Plaintiff/Counterclaim Defendant, v.	Case No. 07-CV-05436 (MLC/DEA) (Consolidated)
SUN PHARMACEUTICAL INDUSTRIES, LIMITED,)))
Defendant/Counterclaim Plaintiff.	
ORION CORPORATION,	Case No. 08-cv-05545 (MLC/DEA)
Plaintiff/Counterclaim Defendant, v.	DEFENDANTS/COUNTERCLAIM PLAINTIFFS' NOTICE OF MOTION PURSUANT TO PARAGRAPH SIX OF THE STIPULATED
SUN PHARMA GLOBAL, INC.,	PROTECTIVE ORDERS TO COMPEL PRODUCTION OF ORION AND
Defendant/Counterclaim Plaintiff.	NOVARTIS DOCUMENTS NOT PROTECTED BY THE ATTORNEY-CLIENT PRIVILEGE

RETURN DATE: AUGUST 17, 2009 ORAL ARGUMENT REQUESTED

TO: Susan Haberman Griffen, Esq.
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Gregory S. Thomas, Esq. Joseph F. Lagrotteria, Esq Michael Jay Plata, Esq. LECLAIRRYAN Two Penn Plaza East Newark, New Jersey 07105 PLEASE TAKE NOTICE that on Monday, August 17, 2009 or at a time and place designated by the United States District Court, or as soon thereafter as counsel may be heard, Defendants/Counterclaim Plaintiffs Sun Pharmaceutical Industries, Ltd. and Sun Pharma Global, Inc. ("Sun"), shall move before the Honorable Douglas E. Arpert, U.S.M.J., of the United States District Court for the District of New Jersey, Trenton Vicinage, Clarkson S. Fisher Federal Building, 402 East State Street, Court Room 6W, Trenton, New Jersey, for an Order granting Sun's Motion Pursuant to Paragraph Six of the Stipulated Protective Orders to Compel Production of Orion and Novartis Documents not Protected by the Attorney-Client Privilege.

PLEASE TAKE FURTHER NOTICE that Sun shall rely upon its Memorandum and Certification of Counsel submitted in support of this Motion.

PLEASE TAKE FURTHER NOTICE that Sun hereby requests oral argument.

Date: July 20, 2009 Respectfully Submitted,

s/ Martin P. Schrama
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